<u>REMARKS</u>

Claims 13-24, 26-29 are pending, with claim 13 being independent. Claims 1-12, and 25 have been cancelled. Claim 13 has been amended and claims 28 and 29 have been added. Support for the amendments is found, for example, in paragraphs 0013 and 0016. No new matter has been introduced.

<u>Rejection under 35 U.S.C. §103(a)</u>

Claims 13-24 and 26 have been rejected as being unpatentable over United States Patent No. 5,933,811 ("Angles") in view of United States Patent No. 6,173,322 ("Hu"). Reconsideration and withdrawal of the rejection is requested because neither Angles, Hu, nor any proper combination of the two describes or suggests at least that a direct connect server "establishes, on the direct connect server, a Uniform Resource Locator (URL) to receive the redirect command ... [and] associates the URL on the direct connect server with a URL on the content server to indicate a location that the user computer was browsing on the content server," as recited by amended claim 13.

Amended claim 13 recites that the system include a content server and a direct connect server. The content server is "coupled to the network separately from the creative selection server, that issues at least one redirect command to a user computer in response to receiving a user request for non-advertising content ... wherein the redirect command includes information descriptive of the location that the user computer was browsing on the content server." The direct connect server establishes, on the direct connect server, a Uniform Resource Locator (URL) to receive the redirect command. The direct connect server then associates the URL on the direct connect server with a URL on the content server to indicate a location that the user computer was browsing on the content server and receives, at the URL of the direct connect server associated with the URL on the content server, creative selection criteria from the user computer. Responsive to the user request to receive non-advertising content and the at least one redirect command from the content server, the direct connect server configures the user profile to reflect the URL of the location that the user computer was browsing on the content server and

generates a request for a creative message as a function of the creative selection criteria, the request including the user profile that reflects the URL of the location that the user computer was browsing on the content server. The direct connect server transmits the request for the creative message to the creative selection server, receives an identification of one or more creatives from the creative selection server, and sends the identification of one of more creatives to the user computer.

In considering a previous instance of the claim, the Office Action recognized that the proposed combination of Angles and Hu differed from claim 13 in several respects. First, the Office Action recognized that Angles failed to describe or suggest a separate direct connect server and a creative selection server. See Office Action, page 5. The Office Action addressed this distinction by relying on Hu's Network Request Manager.

Although Applicant takes issue with the assertions in the Office Action that the proposed combination renders obvious claim 13, Applicant has amended claim 13 to further clarify the distinctions between the direct connect server recited in claim 13 and Hu's Network Request Manager. Specifically, claim 13 has been amended to recite that the direct connect server establishes, on the direct connect server, a Uniform Resource Locator (URL) to receive the redirect command and associates the URL on the direct connect server with a URL on the content server to indicate a location that the user computer was browsing on the content server.

Angles and Hu fail to describe or suggest these features. In fact, the Office Action recognizes that neither reference describes that the redirect command includes information descriptive of the location that the user computer was browsing on the content server. See Office Action on pages 7 and 8 (relying on claims 9 and 16 in Angles for discussion of generally tracking consumer activities). Angles simply does not describe or suggest the recited direct connect server. Certainly, the discussion of tracking consumer activities does not describe or suggest a direct connect server that "establishes, on the direct connect server, a Uniform Resource Locator (URL) to receive the redirect command" and "associates the URL on the direct connect server with a URL on the content server to indicate a location that the user computer was browsing on the content server," as required by amended independent claim 13.

The significance of these distinctions can be important in a variety of implementations. For example, Applicant's direct connect server may be configured to reduce the computational burden on content servers, creative selection servers, and creative servers. See, e.g., paragraphs 0013 and 0016 (describing configuration where direct connect server "greatly reduces the load on the processor"). These distinctions are further exemplified in claims 28 and 29. See, e.g., claim 29 ("The direct connect server is configured to identify the location that the user computer was browsing on the content server without requiring an additional message from the content server.")

Accordingly, for the foregoing reasons, withdrawal of the rejection of claim 13 is requested. The rejection of each of dependent claims 14-24 and 26-29 should be withdrawn for at least the reasons set forth with respect to amended claim 13.

Applicant submits that all claims are in condition for allowance. No fee is due in connection with the filing of this paper. However, authorization is given to apply any necessary charges or any credits to deposit account 06-1050.

Respectfully submitted,

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